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Attorneys for Defendant
ADOBE SYSTEMS INCORPORATED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

DIGITAL REG OF TEXAS, LLC,

Plaintiff,

vs.

ADOBE SYSTEMS INCORPORATED, et al.,

Defendants.

Civil Case No. 12-CV-01971 CW (KAW)

**DECLARATION OF BYRON C. BEEBE
RELATING TO DIGITAL REG'S
MOTION FOR ADMINISTRATIVE
RELIEF FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL (DKT.
NO. 719)**

Judge: Hon. Claudia Wilken
Courtroom: 2, 4th floor

1 I, Byron C. Beebe, declare:

2 1. I am a member of the Bar of this Court and an attorney with the law firm
3 of Weil, Gotshal & Manges LLP, counsel of record for Defendant Adobe Systems Incorporated
4 in the above-captioned matter. I submit this declaration based on personal knowledge and
5 following a reasonable investigation. If called upon as a witness, I could competently testify to
6 the truth of each statement herein.

7 2. On September 4, 2014, Digital Reg filed a Motion for Administrative
8 Relief For Leave To File Under Seal Demonstrative Exhibits Submitted In Conjunction With
9 Offer Of Proof For TE 175. Digital Reg's motion requested that the demonstratives utilized by
10 Digital Reg's expert be filed under seal.

11 3. I have reviewed the demonstratives used by Digital Reg's expert. They
12 contain numerous citations to Adobe's source code. Adobe's source code is very sensitive, non-
13 public, and highly confidential. Public disclosure of Adobe's source code could substantially
14 harm Adobe. While certain details of Adobe's source code were discussed during trial, these
15 demonstratives provide specific detail related to the relationship between and functionality of
16 various portions of Adobe's source code that is not reflected in the written transcript. Adobe
17 requests that the demonstratives utilized by Digital Reg's expert be Filed Under Seal.

18 I declare under penalty of perjury under the laws of the United States of America
19 that the foregoing is true and correct.

20 Executed on September 9, 2014, at Redwood Shores, California.

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22 By: /s/ Byron C. Beebe
23 Byron C. Beebe
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